

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

TRACEY WHITE ET AL,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	Case No.: 4:14CV01490 HEA
	)	
THOMAS JACKSON, ET AL,	)	
	)	
Defendants.	)	

***DEFENDANTS CITY OF FERGUSON, THOMAS JACKSON, AND  
JUSTIN COSMA’S JOINT MOTION TO DISMISS PLAINTIFFS’  
THIRD AMENDED COMPLAINT (DOC. NO. 81)***

COME NOW Defendants, the City of Ferguson, Thomas Jackson and Justin Cosma (“Defendants”), and for their Joint Motion to Dismiss Plaintiffs’ Third Amended Complaint (Doc. No. 81), state:

1. On May 27, 2015, Plaintiffs filed their Third Amended Complaint, *inter alia*, naming additional officers as defendants.
2. Under the law of the case, these Defendants respectfully request that this Court dismiss Plaintiffs’ stated claims for intentional infliction of emotional distress and negligent supervision against Defendants. Doc. No. 70.
3. Defendants re-assert and re-allege the arguments in their Motion to Dismiss Plaintiffs’ Second Complaint (Doc. Nos. 50 and 51), and if the rationale and analysis of Court in making that ruling, which is now the law of the case, is applied, this aspect of Defendants’ Motion to Dismiss would be denied.

WHEREFORE, Defendants respectfully request that this Court should grant their Motion to Dismiss, and for such other relief as this Court deems just and proper.

/s/Peter J. Dunne

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I hereby certify that a copy of the foregoing filed electronically with the Clerk of the Court this 10<sup>th</sup> day of June, 2015, to be served by operation of the Court's electronic filing system upon the following:

- Gregory L. Lattimer, Attorney for Plaintiffs, 1200 G. Street, N.W., Suite 800, Washington, D.C. 20005, [lattlaw@aol.com](mailto:lattlaw@aol.com);
- Malik Z. Shabazz, Attorney for Plaintiffs, 1200 G. Street, N.W., Suite 800, Washington, D.C. 20005, [attorneyshabazz@yahoo.com](mailto:attorneyshabazz@yahoo.com);
- Reginald A. Green, Attorney for Plaintiffs, One Georgia Center, Suite 605, 600 West Peachtree Street, N.W., Atlanta, Georgia 30308, [rgreene@greenelegalgroup.com](mailto:rgreene@greenelegalgroup.com); and
- Michael E. Hughes, Attorney for Defendants St. Louis County and Chief Jon Belmar, 41 S. Central Ave, Clayton MO 63105, [mhughes2@stlouisco.com](mailto:mhughes2@stlouisco.com), [pgunn@stlouisco.com](mailto:pgunn@stlouisco.com).

/s/ Peter J. Dunne

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